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3 District of Nevada
Nevada bar Number 13644
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,) Case No.: 2:18-mj-0955-NJK
9 Plaintiff,) Stipulation to Continue Preliminary
10 vs.) Hearing Date (Third Request)
11 JAELEAH MARIA GUIDA, and)
LAURA VELREE GUIDA,)
12 Defendants.)
13

14 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas
15 A. Trutanich, United States Attorney, Susan Cushman, Assistant United States Attorney,
16 counsel for the United States of America and Adam Gill, Esq., counsel for defendant Jaeleah
17 Maria Guida and Lance Hendron, Esq. Counsel for defendant Laura Velree Guida:

18 THAT THE PRELIMINARY HEARING CURRENTLY SCHEDULED FOR
19 April 2, 2016, at 4:00 p.m. before U.S. Magistrate Judge Koppe be vacated and set to a time
20 convenient for the Court, but no later than 45 days from the current setting.

21 This stipulation is entered into for the following reasons:

22 1. This case will be resolved by way of a pre-indictment plea. Both defendants
23 will be waiving indictment and pleading guilty to a criminal information. The criminal
24 information and other relevant documents were filed with the Court on March 28, 2019, in

1 order for the Court to consider the proposed plea agreement entered into by the parties and
2 then set a hearing for a change of plea.

3 2. Defense counsel and counsel for the government agree to the continuance.

3 The defendants are not detained and agree to the continuance.

5 4. Denial of this request for continuance could result in a miscarriage of justice.

6 5. The additional time requested by this Stipulation is excludable in computing
7 the time from the filing of the criminal complaint through which the government must assert
8 an criminal Information or seek an Indictment by the Grand Jury pursuant to the Speedy
9 Trial Act, Title 18, United States Code Section 3161 (h)(1)(G) and (h)(7)(A), when
10 considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B) and
11 3161(h)(7)(B)(iv).

12 6. This is the third request for a continuance.

Dated this 29th day of March 2019.

Respectfully Submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Susan Cushman
SUSAN CUSHMAN
Assistant United States Attorney

/s/ Adam Gill
ADAM GILL, ESQ.
Counsel for defendant Jaeleah Guida

/s/ Lance Hendron
LANCE HENDRON, ESQ.
Counsel for defendant Laura Guida

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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

1 UNITED STATES OF AMERICA,) Case No.: 2:18-mj-0955 NJK
2 Plaintiff,) Order Continuing Preliminary
3 vs.) Hearing Date
4 JAELEAH MARIA GUIDA, and)
5 LAURA VELREE GUIDA,)
6 Defendants.)

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FINDINGS OF FACT

17 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
18 Court finds that:

- 19 1. The period within which the government may assert an Information or seek an
20 Indictment through the Grand Jury against the defendant is hereby extended from the date
21 of the filing of the complaint up through and including May 17, 2019.
- 22 2. This case will be resolved by a pre-indictment plea. Both defendants will be
23 waiving indictment and pleading guilty to a criminal information. The criminal information
24 and other relevant documents were filed with the Court on March 28, 2019, in order for the

1 Court to consider the proposed plea agreement entered into by the parties and then set a
2 hearing for a change of plea.

3 3. Both counsel for the defendants and counsel for the government agree to the
4 continuance.

5 ||| 4. The defendants are not detained and agree to the continuance.

6 5. The additional time requested by this Stipulation is excludable in computing the
7 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title
8 18, United States Code Section 3161(h)(10(G) and (h)(7)(A), when considering the factors
9 under Title 18, United States Code, Sections 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

10 6. This is the third request to continue the preliminary hearing.

For all of the above-stated reasons, the end of justice would best be served by a continuance of the preliminary hearing.

ORDER

14 IT IS ORDERED that the preliminary hearing currently scheduled for April 2, 2019,
15 at 4:00 p.m. be vacated and continued to May 15, 2019, at 4:00 p.m., in Courtroom
16 3D.

17 DATED this 29th day of March, 2019.

UNITED STATES MAGISTRATE JUDGE